

FILED

NOV 20 2019

Clerk, U.S. District Court
Texas Eastern

UNITED STATES DISTRICT COURT

for the

Eastern District of Texas

TYLER _____ Division

ROXANNE JOGANIK and DARLINA ANTHONY

Case No. 6:19cv517-JCB-KNM

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

EAST TEXAS MEDICAL CENTER
OLYMPIC SWIMMING POOL

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT AND REQUEST FOR INJUNCTION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	ETMC Emergency Center and Olympic Swimming Pool
Street Address	100 Municipal Dr.
City and County	Gun Barrel City,
State and Zip Code	Texas 75156-3702
Telephone Number	903-713-1500
E-mail Address	UNKNOWNEN

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 2 (Rev. 12/16) Complaint and Request for Injunction

Defendant No. 1

Name

ETMC A COMPANY SEE BELOW

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Defendant No. 2

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Defendant No. 3

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Defendant No. 4

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

discrimination of Non Baptist Party's criminal acts of Serration and slavery ..22 U.S. Code § 7102 - and 13th and 14th Amendment;;
humans citizen civil Rights by declaring The transgender people as a protected class and grant all relief every American should have and stop all religious persecution from the baptist church and any others

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* _____, is a citizen of the
State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* ETMC or now UTMC _____, is incorporated
under the laws of the State of *(name)* ETMC or now UTMC _____,
and has its principal place of business in the State of *(name)*
Tyler Texas , Gun Barrel City and Unknown ☒ .

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* ETMC or now UTMC works _____, is a citizen of
the State of *(name)* Unknown _____. Or is a citizen of
(foreign nation) Vatican Palace root of all Christians .

b. If the defendant is a corporation


The defendant, (name) ETMC or now UTM, is incorporated under the laws of the State of (name) Texas and unknown, and has its principal place of business in the State of (name) ETMC or now UTM. Or is incorporated under the laws of (foreign nation) Vatican Palace root of Christians, and has its principal place of business in (name) ETMC or now UTM.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:


2. Enjoins Defendants, their agents, employees, successors, and all other persons in active concert or participation with them, from:

~~a. Discriminating against any person in the terms, conditions, or privileges of the~~ 

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

1. This action is brought by the Best interest of a slave population of the United States of America the Transgender community. Roxanne Feme fateL Joganik and Parties to this Action are as follows: Darlina Anthony, and Roxanne Joganik, of Texas, to enforce the provisions of Title VII of the Civil Rights Act, also the Right of any person of the United States to Life, Liberty, and the Pursuit of Happiness and Religious Freedom,,, The Plaintiff was attacked by a group of the Defendants: East Texas Medical Center Swimming pool, Baptist Employees, and Radical Baptist Woman Haters that worked with other people to cause discrimination of Non Baptist Party's. Because of Baptist hatred, Darlina Anthony and Roxanne Joganik Were forced, verbal abused, and asked to leave the said area (ETMC swimming 

B. What date and approximate time did the events giving rise to your claim(s) occur?

This has been on going and will continue If the Defendant is stopped from further Discrimination...

C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*

1. This action is brought by the Best interest of a slave population of the United States of America the Transgender community. Roxanne Feme fateL Jogani'k and Parties to this Action are as follows: Darlina Anthony, and Roxanne Jogani'k, of Texas, to enforce the provisions of Title VII of the Civil Rights Act, also the Right of any person of the United States to Life, Liberty, and the Pursuit of Happiness and Religious Freedom.,,, The Plaintiff was attacked by a group of the Defendants: East Texas Medical Center Swimming pool, Baptist Employees, and Radical Baptist Woman Haters that worked with other people to cause discrimination of Non Baptist Partys. Because of Baptist hatred, Darlina Anthony and Roxanne Jogani'k Were forced, verbal abused, and asked to leave the said area (ETMC swimming area), bound and deprived from medical therapy at ETMC.

IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

My Health is at risk.. I am over weight need to work out in the pool and Gym, to test the ability of my heart in a safe place.. As I could have a heart Attack.. Roxanne Jogani'k,s Doctor has given orders for the Pool ETMC or now UTMC still bind me from using there swimming poolThis could lead to health risks and endanger my Life. I Roxanne I am a 62 year old Female On Medicare. I Roxanne must be allowed now a Delay could risk my Life... Death would not allow me to finish my claim In Federal court.. Sending a message to big Corps Like ETMC that they can cause Death with out damages or over site to protect the poor weak under the provisions of Law... From hate crimes of subversion and Religious prosecution.. AS LGBTQ People are now claimed Un-Holy by the Church and country of "Vatican city" the holy church of Rome not a UNITED NATION member or ALIED To the USA....

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

14. The defendant must be restricted form discrimination during the pending of this case threw a Order attached in the form of a injunction to enforced by this court.. Order is to stop all discrimination at this time and until this case is heard to be enforce with in threat of Fine or imprisonment of Defendant party's to action and any other party that discriminate or promotes actions that would lead to restriction of the party to use of swimming pool during the pending of this case for medical or to also include general membership benefits of any Transgender person as Roxanne Jogani'k and Darlina Anthony where before discrimination happened.

15. Coercion, intimidation, threats, or interference with persons in the exercise or enjoyment of, or on account of their having exercised or enjoyed, their rights under the Law to included the Affordable care act and Medicare rules on gender and sex right to care and subversion and in enslavement threw

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 11/18/2019

Signature of Plaintiff

Printed Name of Plaintiff

Roxanne Joganik
Roxanne Joganik

B. For Attorneys

Date of signing: 11/18/2019

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

Pro se - Roxanne Joganik
Pro se Roxanne Joganik
NA
NA
212 Legendary Lane Apt. 1003
Gun Barrel City, Texas 75156-7312
903-340-8004
roxann_love@yahoo.com

FILED

NOV 20 2019

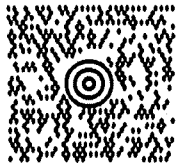
Clerk, U.S. District Court
Texas Eastern

ROXANNE JOGANIK
(803) 340-8004
APT 1003
212 LEGENDARY LANE
GUN BARREL CITY TX 75156

1 LBS 1 OF 1
SHP WT: 1 LBS
DATE: 19 NOV 2019

SHIP UNITED STATES DISTRICT COURT
TO: EASTERN DISTRICT OF TEXAS
STE 106
211 W FERGUSON ST

TYLER TX 75702-7222

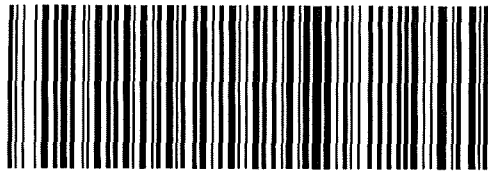


TX 757 0-20



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TRACKING #: 1Z 169 V56 03 2604 0221



BILLING: P/P

REF #2: AG

18H 13.00H 22P 450 17.50 09/2019

EASTERN DISTRICT OF TEXAS
211 W FERGUSON ST
STE 106
TYLER TX 75702

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